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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

Innovation Law Lab, *et al.*,

Plaintiffs,

V.

Kirstjen Nielsen, *et al.*,

Defendants.

CASE NO.: 3:19-CV-00807-RS

**JOINT MOTION & STIPULATION TO
PARTIALLY UNSEAL FILINGS UNDER
LOCAL RULE 7-11**

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**JOINT MOTION & STIPULATION TO PARTIALLY UNSEAL FILINGS UNDER
LOCAL RULE 7-11**

Plaintiffs move under Local Rule 7-11 to partially unseal the Notices to Appear (“NTAs”) for the individual Doe Plaintiffs filed in this case on March 1, 2019. *See* ECF No. 44; *see also* ECF No. 74 (order granting motion to seal). Defendants join Plaintiffs in that request.

The Supreme Court of the United States has granted a petition for a writ of certiorari to review the judgment of the court of appeals affirming this Court’s preliminary injunction in this case. *See Wolf v. Innovation Law Lab*, No. 19-1212 (S. Ct.), cert. granted Oct. 19, 2020. Pursuant to Supreme Court Rule 26, Plaintiffs and Defendants have agreed to include excerpts of the Doe Plaintiffs’ NTAs in their Joint Appendix, which will be publicly available when filed in the Supreme Court. Filing these documents as part of the Joint Appendix will facilitate the Supreme Court’s consideration of this case.

The parties are submitting the proposed redacted excerpts to the NTAs as Ex. A to this motion. The parties agree that the public filing of these excerpts will not affect the interests identified in Defendants' motion to seal, ECF No. 44, because the parties have redacted all personal information that could identify the Plaintiffs. Accordingly, the parties move this Court to partially unseal the NTAs, which will allow excerpted and redacted versions of these documents to be filed as part of their Joint Appendix to the Supreme Court.

1 Dated: November 25, 2020

2 Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on November 25, 2020, I caused a PDF version of the foregoing document to be electronically transmitted to the Clerk of the Court, using the CM/ECF system for filing and mailed courtesy copies to all necessary parties using certified mail.

Dated: November 25, 2020

/s/ Judy Rabinovitz
Judy Rabinovitz
Attorney for Plaintiffs